

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

IN RE: Cary A Bolton	)	Chapter 13
Angela F Bolton	)	Case No. 23 B 11640
Debtor(s)	)	Judge David D. Cleary

**Notice of Motion and Certificate of Service**

Cary A Bolton  
2649 171st St  
Hazel Crest, IL 60429

Debtor Attorney: Cutler & Associates Ltd  
via Clerk's ECF noticing procedures

Angela F Bolton  
2649 171st St  
Hazel Crest, IL

On November 20, 2023 at 2:30 pm, I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, either in Dirksen Federal Building, 219 S. Dearborn St, Courtroom 644, Chicago, IL 60604 or electronically as described below, and present this motion, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 122 6457 and the password is Cleary644. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE

I certify under penalty of perjury that this office caused a copy of this notice and the attached motion to be delivered to the persons named above by U.S. mail or by the methods indicated on Monday, November 13, 2023.

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 08/31/2023.
2. The debtor(s) have failed to file a feasible plan. The proposed plan now runs 145 months.
3. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

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Chicago, IL 60604  
(312) 431-1300